

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NONRULE POLICY DOCUMENT**

Title: **Natural Gas Emission Factors/SIP Compliance**

Identification Number: **Air-021-NPD**

Date Originally Adopted: **November 18, 1998**

Dates Revised: **None**

Other Policies Repealed or Amended: **None**

Brief Description of Subject Matter: **Compliance with current state implementation plan particulate matter limits by combustion sources burning only natural gas.**

Citations Affected: **326 IAC 6-1**

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. A revision to this nonrule policy document may be put into effect by IDEM once the revised nonrule policy document is made available for public inspection and copying. IDEM will submit revisions to the Indiana Register for publication.

This nonrule policy document addresses the particulate matter emission limits in 326 IAC 6-1 for combustion sources burning only natural gas. Sources of particulate emissions in Dearborn, Dubois, Marion, Vigo, Wayne, Howard, Vanderburgh, Clark and St. Joseph counties have been guided since 1979 by control strategies and emission limitations in 326 IAC 6-1-8.1 through 326 IAC 6-1-18. These limitations are based on a number of criteria, including emission factors, stack tests, available control technologies, and modeling, that ensure that each county moves toward attainment status within the time frame specified by the United States Environmental Protection Agency (U.S. EPA). Accordingly, these rules are part of Indiana's state implementation plan. The U.S. EPA approved this plan, and all of these areas have subsequently achieved attainment of the National Ambient Air Quality Standard for particulate matter. Emission limitations for sources burning natural gas were established using U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors. U.S. EPA periodically updates AP-42 and revises emission factors on the basis of new or better information. The fifth edition (1995) of this document includes emission factors for natural gas fired combustion sources that have changed since the original particulate matter limitations were issued, and a number of natural gas fired combustion sources have informed IDEM that they cannot meet their particulate matter state implementation plan limits when calculated using these changed emission factors.

The purpose of setting low limits for combustion sources was to encourage facilities in nonattainment areas to burn the cleanest fuels possible. Natural gas is a very clean fuel and emits very little particulate matter. IDEM did not intend to require control devices for combustion sources that use only natural gas for the sole purpose of reducing the small amount of particulate matter generated from natural gas combustion. Particulate matter emissions from

natural gas combustion sources that are calculated using the fifth edition of AP-42 are still small and have no effect on the success of the state implementation in achieving attainment.

IDEM shall not pursue enforcement action against any combustion source that burns natural gas exclusively, that is subject to 326 IAC 6-1, and that does not exceed particulate matter limits when calculated using emission factors set prior to the fifth edition of AP-42. Lake County sources subject to 326 IAC 6-1-10.1 through 326 IAC 6-1-11.1 are excluded from this policy. This policy does not entail a relaxation in particulate matter emission limits, as the actual emissions from these natural gas combustion sources will not increase. IDEM is considering a rulemaking regarding this matter and published a First Notice of Comment Period in the Indiana Register on October 1, 1998.